

**Proposed rear extensions (above that approved under reference 2013/7078/P)**  
**at 29 High Holborn**  
**to provide**  
**new office floorspace**  
**for**  
**Westcombe Management**

**Planning, Design, Access, Heritage and Sustainability Statement**



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## **INTRODUCTION**

This statement supports the application for a fourth and fifth floor extension above that approved under reference **2013/7078/P** at 29 High Holborn. The site is in the Bloomsbury Conservation Area. The building is contemporary.

The consent referred to above was granted permission on 11<sup>th</sup> July 2014. This proposal seeks two additional floors to reflect the scale of the adjacent sites as can be seen in the photograph overleaf.

## **SITE AND SURROUNDINGS**

The site currently contains a six storey building fronting High Holborn with a two storey building to the rear fronting Fulwood Place. The site is part of the Central London Area (as defined in the Camden UDP) and in an Archaeological Priority Zone.

The building at the rear is brick. The rear and flank elevations are utilitarian with a mix of materials including render, red and white brick, and plain flettons. There are external staircases accessing to Fulwood Place.

High Holborn is an area of change with a number of extensive mixed use redevelopments of varying architectural styles. Redevelopment of this building is not achievable by reason of the Conservation Area status and the quality of the High Holborn street frontage. The building is served by a passageway to Fulwood Place which accesses Grays Inn containing a formal arrangement of buildings serving the legal community. The ground floor of the building runs through to Fulwood Place at the rear however there is a void at first floor level between the front building and a two storey office building at the rear of the site. The two storey rear building and the High Holborn building are linked via a corridor at second floor level.

The existing building is shown with its context overleaf:



The application site with existing two storey building

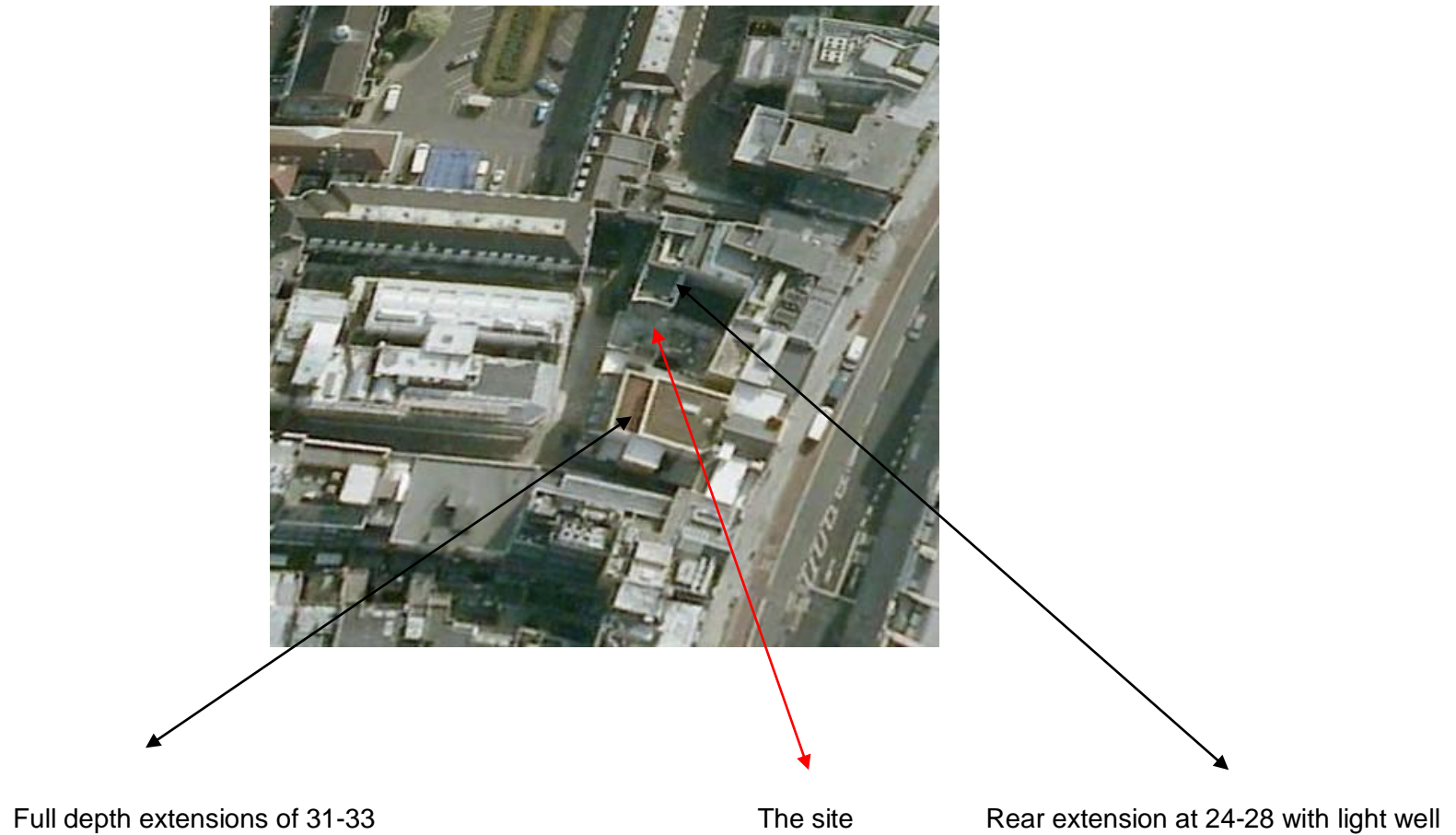


Fulwood Place looking towards the site



Fulwood Place looking away from the site (in foreground)

The adjacent buildings project the full depth of the space between High Holborn and Fulwood Place. No 31-33 fully projects the depth of the site as shown above. No 27 has an arrangement similar to that of this application whereby there are buildings fronting each highway with a space between as can be seen in the aerial photograph overleaf.



## **THE PROPOSED LAYOUT AND DESIGN**

The proposal seeks to respond to the under use of the flat roof area at the rear of the building. The design concept flows from an evaluation of the building, planning policy and practical considerations. The most important context considerations are:

- The maintenance of character of the building and of the area. The design is traditional repeating the themes of the main building
- The maintenance of amenity for existing occupiers. The frontage offices are dual aspect
- The existing access stair is used
- The proposal has minimal impact on the access of light to the adjacent buildings. As an office building the BRE guidelines are applied with greater flexibility than to residential use.
- The adjacent No 31-33 is owned by the applicant. Whilst there are residential occupiers from second floor level upwards with some windows, these face to the north thus there are no sunlight implications.
- The extension would not create any opportunity for overlooking to residential occupiers.

## **NATIONAL POLICY**

### **'National Planning Policy Framework' 2012:**

The Government published the final version of the National Planning Policy Framework on 27 March 2012. This guidance applied with *immediate* effect and superseded all previous national policy statements. Whilst full weight may still be given to local plans adopted since 2004, 'due weight' should be given to relevant policies in existing plans according to their degree of consistency with the framework. The new guidance reflects the thrust of the draft version, and continues to promote a presumption in favour of sustainable economic development. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. For decision taking, the presumption in favour of sustainable development means that

*" ... where the development plan is absent, silent or relevant policies are out of date, permission should be granted unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole'; or specific policies in this framework indicate development should be restricted ... "*

In considering town centres, the framework states that policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period.

In terms of 'plan making', the Government states that local plan makers should plan positively for development. Policies should allocate sites to promote development and *flexible use of land*; and identify areas where it may be necessary to limit freedom to change the use of buildings, and support those restrictions with a *clear explanation*. The framework states that local plans should use a proportionate evidence base.

It is confirmed that the National Planning Policy Framework is a material consideration for the purposes of Section 38(1) of the Planning and Compulsory Purchase Act 2004, and that when determining development proposals, local authorities should apply the presumption in favour of sustainable development.

Proposals for economic development such as this application meet the Government commitment to securing economic growth in order to create jobs and prosperity. Paragraph 19 notes that significant weight should be placed on the need to support economic growth through the planning system.

In considering heritage matters the framework states that policies should be positive and local planning authorities should take into account:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

Decisions should be proportionate to the value of the heritage asset; the more important the asset, the greater the weight should be. The guidance notes a different regime for grade I and II\* listed buildings, compared to unlisted buildings in a conservation area.

Paragraph 137 notes that “Local planning authorities should look for opportunities for new development within Conservation Areas”.

At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development which for decision-taking means: approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out-of-date, granting permission. The UDP and the Core Strategy are considered below.

### **THE DEVELOPMENT PLAN**

The Core Strategy has been adopted and detailed policy is expressed through the Development Policies document. The Holborn area is largely characterised by offices, and is identified as a growth area in this Core Strategy and the London Plan.

The proposal implements Core Strategy policies CS8 and CS9 which seek to secure a strong economy and promote the provision of office floorspace to meet the forecast demand of 615,000 sq m to 2026.

These strategic policies are applied in detail through the Development Policies document.

The proposal is below the 500sqm threshold to non-residential developments as regard the achievement of a BREEAM rating of 'excellent'.

Policy DP24 seeks to achieve high quality design; it states

**The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:**

- a) character, setting, context and the form and scale of neighbouring buildings;**
- b) the character and proportions of the existing building, where alterations and extensions are proposed;**
- c) the quality of materials to be used;**
- d) the provision of visually interesting frontages at street level;**
- e) the appropriate location for building services equipment;**
- f) existing natural features, such as topography and trees;**
- g) the provision of appropriate hard and soft landscaping including boundary treatments;**
- h) the provision of appropriate amenity space; and**
- i) accessibility.**

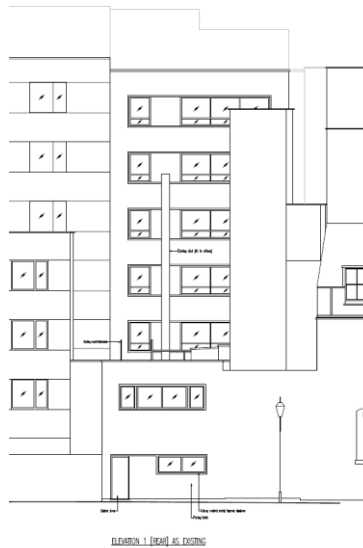
The proposal draws on the themes of the adjacent buildings in detailed design, form and bulk, thus respecting its context. The elevations, material and fenestration replicate those of the existing building. In this respect it will preserve and enhance the positive elements of the local character of this part of Holborn drawing on its distinctive character.

Policy DP25 addresses heritage considerations. The proposal in reinforcing the form and street pattern preserves and enhances the character and appearance of the area.

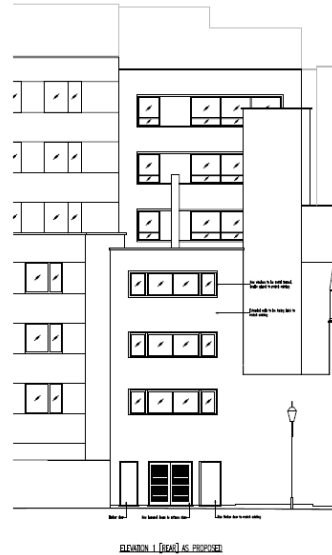
The design satisfies Policy DP26 in that it would not lead to overshadowing or loss of sunlight or daylight.

The proposal includes lift access to the new floors fulfilling the objectives of DP 29. Waste facilities are provided.

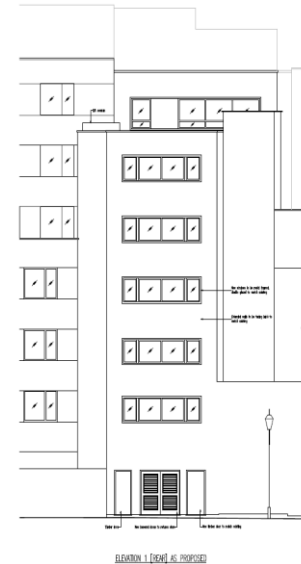
Supplementary guidance CPG1 states that extensions should be subordinate to the host building in terms of scale and situation, unless the specific circumstance of the site would enable an exception to this approach. The plans (copied below) show that even with the two additional storeys the extension is still lower than the host building.



**Existing rear elevation (unextended)**



**Elevation showing extensions permitted under reference 2013/7078/P**



**Proposed elevation showing extensions permitted under reference 2013/7078/P and the two additional floors subject of this application.**



## **ACCESS CONSIDERATIONS**

The applicants have considered the proposal, and understand what is appropriate and feasible for the site in its context. The application is submitted in full thus showing how detailed access considerations are incorporated into the design. The buildings will comply with Part M of the Building Regulations with level access and appropriate services on each floor. All future users will have equal and convenient access to buildings and spaces. The access allows the buildings to have flexibility to meet future changing needs. The approach to the entrance will be level, a matter that can be secured by a levels condition. It will be illuminated and have accessible level access over the threshold level. All doors, internal doorways and hallways allow access for wheelchair users to manoeuvre. The front doors have a clear opening width exceeding 800mm and internal doors a clear opening width of at least 750mm. All rooms are generous allowing for turning of a wheelchair.

The site is directly accessible to much of central London. Nearby there are shops and extensive links to public transport.

## **SUSTAINABILITY**

The proposal aims to incorporate high standards of efficiency and to address aspects of renewable resources and sustainable design within the development. The primary environmental issue is the prevention of global warming through reduction of greenhouse gas emissions and especially carbon dioxide. Buildings are responsible for 50% of energy use in the UK and the domestic sector for 60% of this. A development as proposed here has the responsibility to demonstrate best practice and minimise impact through integration of renewable resources with careful design and specification of services and materials. There is a real opportunity to demonstrate the potential to achieve a high environmental specification within the private development sector. The buildings impact is its energy-in-use, i.e., heating, lighting and ventilation, and as such it is very important to achieve an integrated approach, and the following items are key considerations:

Thermal design; Daylighting; Ventilation; Efficient lighting and appliances; Efficient and low-carbon energy supply systems.

The specification for the design and construction of the buildings will be as below:

**Building Envelope** – The thermal performance of the building envelope should be improved to at least: walls 0.28w/m<sup>2</sup>.k, roof 0.18w/m<sup>2</sup>.k, ground floor 0.20w/m<sup>2</sup>.k. The glazing specification should also exceed the building regulations minimum, with a target of 1.5w/m<sup>2</sup>.k.

**Airtightness** – In buildings built to current standards, ventilation and unwanted infiltration results in the greatest single source of heat-loss. We would therefore recommend designing and detailing the construction to achieve an air-tightness of 0.5 air changes per hour. This is a 50% improvement over current UK practice.

**Heating & Hot Water** – Heating and hot water should be supplied via a high efficiency condensing gas boiler connected to a cylinder for storage.

In addition to developing a low-energy design, the following areas should be considered when addressing sustainable building and developments:

**Water** – The specification of low-flush toilets, efficient showers and taps can reduce the consumption of mains water by nearly 50% compared to the UK average. In addition, external water butts to collect rainwater from the roof for garden use, is an inexpensive and effective method to reduce consumption.

**Daylighting** – By designing good levels of internal daylighting, the building reduces the dependency on artificial lighting. This can also impact on the perceived quality of the internal spaces.

**Lighting and Appliances** – Wherever possible, all lighting (including external) should be energy efficient CFL's to reduce electricity use and be fitted with suitable control systems. Any appliances included in the development should be A-rated for energy and water efficiency.

**Materials** – The design team will look to incorporate either locally sourced materials, or those with low-embodied energy. However, it is important to ensure that the long-term performance of the building element is not compromised. This is particularly relevant for the specification of insulation. In addition to this, any timber or timber products should be sourced from FSC (Forest Stewardship Council) or equivalent sources (PEFC), as poor forest management practices can have a substantial impact on local wildlife. The development is to be of timber frame construction, which means a large quantity of materials forming the construction of the dwelling will be from these sources.

**Transport** – There is suitable space provision for the safe storage of bicycles in the large ground floor lobby

### **INFRASTRUCTURE CONTRIBUTIONS INCLUDING CIL**

We are aware that the Community Infrastructure Levy introduced by the Mayor on 1<sup>st</sup> April 2012 to fund "Crossrail" applies to the site.

Any other infrastructure payment requests should be properly justified and related to the development. The applicant is not declining making contributions and will submit a draft Undertaking if requested, but would seek justification as to the precise sums which they will willingly negotiate with the case officer in the lifetime of the application at such time where the request is shown to meet the statutory tests.

## **CONCLUSIONS**

We believe that the site has an opportunity to provide two additional floors of offices above that permitted under reference **2013/7078/P** in a high quality extension in keeping with the form of the existing building and the surrounding area. In developing the site in a high quality manner we can introduce significant benefits to the locality with a development appropriately designed, perpetuating the form of the locality and providing additional high quality commercial space.

In the light of the above and given the compliance with National Policy, the Core Strategy and the adopted UDP we would seek your favourable recommendation and consideration.